

Linda St. Pierre
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McCalla Raymer Leibert Pierce, LLC
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UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON
EUGENE DIVISION

In re:

Case No.: 23-61565-tmr13

Cory Eugene Williams and
Tina Sue Williams,
Debtors.

**OBJECTION TO CONFIRMATION OF
PLAN**

COMES NOW Freedom Mortgage Corporation (hereinafter known as "Creditor"), a secured creditor holding a Deed of Trust against the real property commonly known as 88404 Stephens Rd, Springfield, OR 97478 (the "Property"), and for the reasons stated below, objects to confirmation of Debtors Chapter 13 plan (Doc. No. 2) (the "Plan").

1. Debtors' Plan does not treat Creditor's prepetition arrearage claim of \$2,252.44 as set forth in its Proof of Claim filed in this case on October 9, 2023, as claim (8-1).
2. Confirmation of the Plan should be denied until Debtors amend the Plan to properly treat Creditor's claim.
4. Creditor reserves the right to supplement and/or amend this Objection to Confirmation.

1 WHEREFORE, Creditor prays that the Court will:

- 2 1. deny confirmation,
3 2. award reasonable attorney's fees, and
4 3. grant such other and further relief as is just and equitable.
5

6
7 Dated: February 8, 2024

McCalla Raymer Leibert Pierce, LLC

8 By: /s/Linda St. Pierre

9 Linda St. Pierre
10 Oregon Bar No. 200446
11 Attorney for Secured Creditor
12 50 Weston Street
13 Hartford, CT06120
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15 Email: Linda.St.Pierre@mccalla.com
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1 **UNITED STATES BANKRUPTCY COURT**
2 **DISTRICT OF OREGON**
3 **EUGENE DIVISION**

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5 Cory Eugene Williams and
6 Tina Sue Williams,
7 Debtors.

PROOF OF SERVICE

8 I hereby certify, under penalty of perjury pursuant to 28 U.S.C. Sec. 1746 and the laws of
9 the United States, and declare as follows:

- 10
- 11 1. That I am a citizen of the United States, over the age of 21 years and competent to be a
12 witness herein.
 - 13 2. That on February 8, 2024, I transmitted by depositing in the United States mail, postage
14 paid copies of the: Objection to Confirmation of Plan, addressed as follows:

15 Cory Eugene Williams
16 Tina Sue Williams
17 88404 Stephens Road
18 Springfield, OR 97478
19 **Debtors**

20 Devon Thorson
21 Recovery Law Group
22 10260 SW Greensburg Road
23 Ste 4th Floor
24 Portland, OR 97223
25 **Attorney for Debtors**

26 Naliko Markel
27 Office of the Standing Chapter 13 Trustee
28 400 E. 2nd Ave., Ste 200
Eugene, OR 97401
Trustee

US Trustee
US Trustee, Eugene
405 E 8th Ave #1100
Eugene, OR 97401-2706

Copies were also transmitted electronically via ECF to:

• Devon Thorson	dthorson@recoverylawgroup.com
• US Trustee	USTPRegion18.EG.ECF@usdoj.gov
• Naliko Markel	ecf@eugene13.com

Dated: February 8, 2024 McCalla Raymer Leibert Pierce, LLC

By: /s/ Linda St. Pierre

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Hartford, CT06120
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